

EXHIBIT 4

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, et al.

Plaintiffs,

-vs-

**RESPONSES TO PLAINTIFFS' FIRST
SET OF REQUESTS FOR PRODUCTION TO
DEFENDANT CITY OF BUFFALO, N.Y.**

CITY OF BUFFALO, et al.

Civil Action No.: 18-cv-719

Defendants.

Defendant, CITY OF BUFFALO ("City") offer the following in response to "PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION TO DEFENDANT CITY OF BUFFALO, N.Y." based on information available as of the date prescribed herein.

GENERAL OBJECTIONS

1. The City responds to each and every document request subject to the general objections set forth herein. These objections form a part of the response to each and every document request and are set forth herein to avoid duplication by restating them for each document request. These general objections may be specifically referred to in response to a certain document request for the purpose of clarity. However, the failure specifically to refer to a general objection is not and shall not be construed to be a waiver of any general objection, even if other general objections are specifically stated in response to a document request.

2. The City objects to each of the requests to the extent that they seek information and documents that they seek materials prepared in anticipation of

RESPONSE: Without waiving any general or specific objections and to the extent that the request is understood, at this time, the City is not aware of any responsive documents or communications at this time.

REQUEST NO. 17: All completed BPD Roadblock Directives.

OBJECTION: The City objects to this request insofar as it is overly broad, burdensome, vague, is not likely to result in the production of admissible evidence, and seeks information protected by the deliberative process privilege, the law enforcement privilege, and which may be sealed, part of an ongoing investigations, sealed, subject to other confidentiality concerns.

RESPONSE: Without waiving any general or specific objections, the City is aware of the "Buffalo Police Department Roadblock Directive(s)" attached hereto and will supplement this request if and when additional documents or communications are located.

REQUEST NO. 18: All completed Traffic Safety Checkpoint Tally Sheets.

OBJECTION: The City objects to this request insofar as it is overly broad, burdensome, vague, is not likely to result in the production of admissible evidence, and seeks information protected by the deliberative process privilege, the law enforcement privilege, and which may be sealed, part of an ongoing investigations, sealed, subject to other confidentiality concerns.

RESPONSE: Without waiving any general or specific objections, the City is aware of the "Traffic Safety Checkpoint Tally Sheet(s)" attached hereto and will

supplement this request if and when additional documents or communications are located.

REQUEST NO. 19: All other completed directives, tally sheets, and/or similar Documents and Communications discussing the date, time, location, and/or results of Checkpoints carried out by the BPD, to the extent not already responsive to Requests 17 and 18.

OBJECTION: The City objects to this request insofar as it is overly broad, burdensome, vague, is not likely to result in the production of admissible evidence, and seeks information protected by the deliberative process privilege, the law enforcement privilege, and which may be sealed, part of an ongoing investigations, sealed, subject to other confidentiality concerns.

RESPONSE: Without waiving any general or specific objections, the City is aware of the "Traffic Safety Checkpoint Tally Sheet(s)" and "Buffalo Police Department Roadblock Directive(s)" attached hereto and will supplement this request if and when additional documents or communications are located.

REQUEST NO. 20: For each officer assigned to the Housing Unit, all activity reports and other Documents and Communications completed by Housing Unit Officers to record their enforcement activity (tickets, arrests, traffic stops) on a daily, weekly, monthly, quarterly, and annual basis.

OBJECTION: The City objects to this request insofar as it is overly broad, burdensome, vague, is not likely to result in the production of admissible evidence, and

will supplement this request if and when additional documents or communications are located.

REQUEST NO. 25: Electronic or computerized data compilations sufficient to show for each and every Traffic Ticket issued and/or traffic-related arrest:

- a. The identity of the person(s) stopped, ticketed or arrested (names may be anonymized but stops, tickets, and arrests must be traceable at the individual level);
- b. The identity of the officer issuing the ticket or arrest (Name, Unit, and Badge Number);
- c. The date, time, and Location of the stop giving rise to the ticket or arrest;
- d. Whether the stop occurred at a Checkpoint;
- e. The race of the person(s) stopped, ticketed, or arrested;
- f. The gender of the person(s) stopped, ticketed, or arrested;
- g. The age of the person(s) stopped, ticketed, or arrested;
- h. All VTL and/or City of Buffalo Municipal Code violations for which the person was ticketed and/or arrested;
- i. All misdemeanor, traffic misdemeanor, and felony arrests made as a result of the stop, including the specific provision(s) forming the basis for the arrest;
- j. All weapons seized as a result of the stop, including the nature of the weapon;

k. The total amount of cash seized as a result of the stop;

OBJECTION: The City objects to this request insofar as it is overly broad, burdensome, vague, is not likely to result in the production of admissible evidence, and seeks information protected by the deliberative process privilege, the law enforcement privilege, and which may be sealed, part of an ongoing investigations, sealed, subject to other confidentiality concerns.

RESPONSE: Without waiving any general or specific objections, the City is not aware of any “electronic or computerized data compilations” responsive to this request.

REQUEST NO. 26: Copies of all Traffic Tickets issued by the BPD.

OBJECTION: The City objects to this request insofar as it is overly broad, burdensome, vague, is not likely to result in the production of admissible evidence, and seeks information which may be sealed and/or subject to confidentiality or other privacy concerns.

REQUEST NO. 27: All Documents and Communications relating to any reports, notes, memoranda, files, data sets, databases, or other paper or electronic mechanisms used by You to record, transmit, maintain, tabulate, aggregate, analyze, and/or review information relating to any Checkpoint conducted by the BPD.

OBJECTION: The City objects to this request insofar as it is overly broad, burdensome, vague, is not likely to result in the production of admissible evidence, and seeks information protected by the deliberative process privilege and/or the law enforcement privilege, or which is proprietary in nature.